

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

UNITED STATES OF AMERICA,

CRIMINAL No: 19cr190

VS.

JAMAL KNOX,

Electronically Filed

Defendant.

MOTION TO CONTINUE SENTENCING

AND NOW COMES, the Defendant, Jamal Knox, by and through his counsel, Patrick K. Nightingale, Esquire, who brings the within Motion and in support thereof, avers as follows:

1. Defendant incorporates all prior pleadings in this matter.
2. Sentencing in this matter is scheduled for February 1, 2024.
3. Within counsel respectfully requests a thirty day continuance. Defendant is housed at NEOCC in Youngstown, OH.
4. Within counsel attempted to visit Defendant on January 9, 2024. Officer Kordic advised counsel that Defendant had been hospitalized. Within counsel notified the Court and AUSA Brendan Conway. Mr. Conway confirmed with the United States Marshals Service that Defendant was transferred to a local hospital on December 29, 2023, for injuries that appeared to have resulted from a December 18, 2023, incident wherein Defendant was violently attacked by three other inmates suffering multiple lacerations.

5. Defendant's sentencing memorandum is due January 26, 2024. Within counsel will be unable to visit Defendant before then.

6. Within counsel believes and, therefore, avers that the continuance is necessary as Defendant's advisory guidelines range is 235 – 293 months incarceration.

7. Brendan Conway, Esq., objects to the relief requested citing Defendant's efforts to obstruct justice and intimidate witnesses.

8. Within counsel is unaware of any efforts to obstruct justice or intimidate witnesses since Defendant has been lodged at NEOCC in February, 2023, nor has the Government made any such claims.

9. Alternatively, within counsel respectfully requests that this Honorable Court order that Defendant be returned to the Allegheny County Jail forthwith.

WHEREFORE, the Defendant, Jamal Knox, respectfully requests that this Honorable Court grant the within Motion to Continue Sentencing for approximately thirty (30) days.

Respectfully Submitted,

/s/ Patrick K. Nightingale

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